

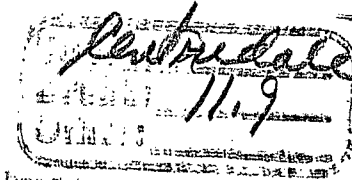


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

33965



SDMS DocID 33965

**URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

MAR 30 2001

Original Bradford Soap Works  
c/o Steven Legraw, President  
200 Providence Street  
West Warwick, RI 02893

Re: Request for Information Pursuant to Section 104 of CERCLA in relation to the New England Container Company, Inc. formerly located at the Centredale Manor Restoration Project Superfund Site in North Providence, Rhode Island

Dear Mr. Legraw:

The United States Environmental Protection Agency ("EPA") is investigating the release or threatened release of hazardous substances, pollutants, and contaminants at the Centredale Manor Restoration Project Superfund Site in North Providence, Rhode Island ("Site"). This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to or generated, treated, stored, or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the cleanup of the Site and their ability to undertake or finance that cleanup. This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Site.

Specifically, EPA has information associating your company with the New England Container Company, Inc. ("New England Container"), a potentially responsible party ("PRP") at the Site. This letter requests your cooperation in providing information and documents to EPA explaining your relationship to New England Container and thereby your relationship to the Site. Between approximately 1952 and 1969 the New England Container Company, Inc. was located at 2074 Smith Street (a portion of the Site), North Providence, Rhode Island.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request **within thirty (30) days** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to twenty-seven thousand five hundred dollars (\$27,500) for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

Your response to this Information Request should be mailed to:

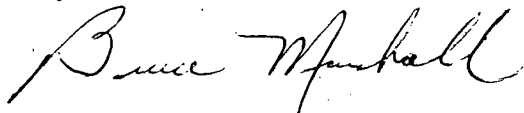
Donna Murray, Enforcement Coordinator  
U.S. Environmental Protection Agency  
Office of Site Remediation & Restoration  
1 Congress Street, Suite 1100 (HBS)  
Boston, MA 02114-2023

If you have general questions concerning the Site or this Information Request, please contact Anna Krasko, Remedial Project Manager at (617) 918-1232. If you have any legal questions, or if your attorney wishes to communicate with EPA on your behalf, please contact Catherine Garypie, Senior Enforcement Counsel, U.S. Environmental Protection Agency, New England, Office of Environmental Stewardship, 1 Congress Street (SES), Boston, MA 02114-2023, or at (617) 918-1540.

Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Bruce Marshall".

Bruce Marshall, Chief  
Search and Cost Recovery Section, Technical & Support Branch  
Office of Site Remediation and Restoration

Enclosures

**INFORMATION REQUEST FOR**  
**CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE**

\*\*\*\*\*

\* **Period Being Investigated:**      1952 to 1969      \*

\*  
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In addition to the questions which follow, this enclosure includes a declaration, a site description, detailed instructions for responding to this request, and definitions of words such as "Respondent," "identify," "waste," and "asset" used in the questions. These materials appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

- Answer each question with respect to the period being investigated noted above unless the question indicates otherwise.
- Answer all questions completely in accordance with the definitions and instructions.
- Complete the enclosed declaration.
- For each question, identify all persons and documents relied upon in the preparation of the answer.
- All information provided for which you are making a claim of business confidentiality or which contains personal privacy information should be contained on separate sheets and clearly marked as confidential or private.
- This request imposes a continuing obligation upon you to submit responsive information discovered after your original response is submitted to EPA.

## INFORMATION REQUEST QUESTIONS

### 1. General Information About Respondent

**NOTE: All questions in this section refer to the present time unless otherwise indicated.**

- a. Provide the full legal name and mailing address of the Respondent.
- b. For each person answering these questions on behalf of Respondent, provide:
  - i. full name;
  - ii. title;
  - iii. business address;
  - iv. business telephone number and FAX machine number.
- c. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, and FAX number.
- d. Provide the complete addresses of Respondent's plants and other buildings or structures **within 60 miles of the Site** where Respondent carried out its operations **during the period being investigated (1952 - 1969)**, excluding those locations where only clerical/office work was performed.<sup>1</sup>
- e. Describe the nature of Respondent's current business at each such location, including but not limited to a brief description of the major products or services Respondent manufactures or provides.
- f. List the Standard Industrial Classification (SIC) code for the business at each location.

### 2. Respondent's Legal and Financial Status

**NOTE: All questions in this section refer to the present time unless otherwise indicated.**

- a. If the Respondent has ever done business under any other name;
  - i. list each such name; and

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<sup>1</sup> If the Respondent has conducted business at more than three locations in this area, please contact the EPA representative listed in the cover letter to determine the appropriate scope of your response.

- ii. list the dates during which such name was used by Respondent.
- b. Provide the following financial information for each of the last five years:
  - i. total sales;
  - ii. net income;
  - iii. depreciation;
  - iv. total assets;
  - v. total liabilities; and
  - vi. net working capital (or net current assets).
- c. If Respondent is a corporation, provide:
  - i. the date of incorporation;
  - ii. state of incorporation; and
  - iii. agent for service of process.
- d. If Respondent was a business entity other than a corporation, provide:
  - i. the type of organization (sole proprietorship, partnership, trust, etc.)
  - ii. the date the business began; and
  - iii. owner, managing partner, or other equivalent person in charge.
- e. If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship, including but not limited to:
  - i. a general statement of the nature of the relationship;
  - ii. the dates such relationship existed;
  - iii. the percentage of ownership of Respondent that is held by such other entity; and
  - iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.
- f. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.
- g. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:
  - i. the titles and dates of the transactions and copies of documents that embody the terms of such transactions (i.e., purchase agreements, merger and dissolution agreements, etc.);
  - ii. the identities of the seller, buyer, and any other parties to such transactions;

- iii. a brief statement describing the nature of the asset purchases or mergers; and
- iv. a brief statement describing and copy(s) of documents embodying any/all indemnification agreements.

h. If Respondent has filed for bankruptcy, provide:

- i. the U.S. Bankruptcy Court in which the petition was filed;
- ii. the docket numbers of such petition;
- iii. the date the bankruptcy petition was filed;
- iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
- v. a brief description of the current status of the petition.

3. Respondent's Operations:

**NOTE: All questions in this section refer to the period being investigated (1952 - 1969) unless otherwise indicated.**

**ALSO NOTE: All questions in this section refer to facilities owned or operated by Respondent within 60 miles of the Site identified in 1.d. unless otherwise indicated.**

a. Provide a brief description of the nature of Respondent's operations at each location including:

- i. the date such operations commenced and concluded; and
- ii. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

b. If the nature or size of operations changed over time, describe those changes and the dates they occurred.

c. List the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

d. In general terms, list the types of raw materials used in these operations.

e. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- i. the types of materials used to clean/maintain this equipment/machinery; and
- ii. the monthly or annual quantity of each such material used.

f. Describe the methods used to clean up spills of liquid or solid materials during

operations, including but not limited to:

- i. the types of materials spilled in operations;
- ii. the materials used to clean up those spills;
- iii. the methods used to clean up those spills; and
- iv. where the materials used to clean up those spills were disposed of.

g. Provide a schematic diagram or flow chart that fully describes and/or illustrates the operations at the Site.

4. Respondent's Wastes and Waste Streams (including By-Products):

**NOTE: All questions in this section refer to the period being investigated (1952 - 1969) unless otherwise indicated.**

**ALSO NOTE: All questions in this section refer to facilities owned or operated by Respondent within 60 miles of the Site identified in 1.d. unless otherwise indicated.**

a. For each type of waste (including by-products) from any operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- i. its name and chemical composition;
- ii. its physical state;
- iii. its color;
- iv. its odor;
- v. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.);
- vi. dates (beginning & ending) during which each type of waste was produced by the operations; and
- vii. the location(s) at which each type of waste was produced by Respondent's operations.

b. Provide a schematic diagram that indicates which part of the operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

c. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:

- i. the type of container in which each type of waste was placed/stored; and
- ii. where each type of waste was collected/stored.

d. Identify (see Definitions) all individuals who had responsibility for the disposal,

treatment, storage, recycling, or sale of wastes generated at the Site.

e. For each location, identify and provide copies of all surveys or studies conducted between 1950 and 1975 about its waste management practices including but not limited to disposal, treatment, storage, recycling, or sale of wastes.

5. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

**NOTE: All questions in this section refer to the period being investigated (1952 - 1969) unless otherwise indicated.**

**ALSO NOTE: Your response to questions in this section must refer to all locations, including but not limited to the Site, to which Respondent sent its wastes from any facility identified in 1.d.**

a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including but not limited to empty barrels.

b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal/treatment/storage/recycling/sale of Respondent's wastes, including, but not limited to empty barrels.

c. Identify (see Definitions) all individuals who currently have and those who have had responsibility for Respondent's environmental matters.

d. For the previous three responses, also provide each individual's:

- i. job title;
- ii. duties;
- iii. dates performing those duties;
- iv. supervisors for those duties;
- v. current position or, if such individual is no longer employed by Respondent, the date of the individual's resignation; and
- vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:

- i. the type of container (e.g. 55 gal. drum, dumpster, etc.);
- ii. the colors of the containers;



- iii. any distinctive stripes or other markings on those containers;
  - iv. any labels or writing on those containers (including the content of those labels);
  - v. whether those containers were new or used; and
  - vi. if those containers were used, a description of the prior use of the containers.
- 
- f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.
  - g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.
  - h. State where Respondent sent each type of its waste, including empty barrels, for disposal, treatment, or recycling.
  - i. Identify (see Definitions) all entities and individuals who picked up waste, including empty barrels, from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).
  - j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.
  - k. For each type of waste specify which Waste Carrier picked it up.
  - l. For each type of waste, state how frequently each Waste Carrier picked up such waste.
  - m. For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).
  - n. For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.
  - o. Provide copies of all documents containing information responsive to the previous seven questions.
  - p. Describe the vehicles used by each Waste Carrier to haul away each type of waste including but not limited to:
    - i. the type of vehicle (e.g., flatbed truck, tanker truck, containerized dumpster truck, etc.);
    - ii. names or markings on the vehicles; and
    - iii. the color of such vehicles.

- q. Identify (see Definitions) all of each Waste Carrier's employees who collected Respondent's wastes and waste containers.
- r. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.
- s. Describe how Respondent managed pickups of each waste, including but not limited to:
- i. the method for inventorying each type of waste;
  - ii. the method for requesting each type of waste to be picked up;
  - iii. the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
  - iv. the amount paid or the rate paid for the pickup of each type of waste;
  - v. the identity of (see Definitions) Respondent's employee who paid the bills; and
  - vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.
- t. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.
- u. State the basis for and provide any documents supporting the answer to the previous question.

6. Respondent's Relationship to Site:

**NOTE: All questions in this section refer to the period being investigated (1952 - 1969) unless otherwise indicated.**

**ALSO NOTE: All questions in this section refer to facilities owned or operated by Respondent within 60 miles of the Site identified in 1.d. unless otherwise indicated.**

- a. Please describe Respondent's business association with New England Container.
- b. Did your association with New England Container involve the buying of drums or other size/type of container? Unless your answer is an absolute "No", please explain. Include but do not limit your response to:
- i. the dates of each pickup and delivery;
  - ii. the type(s) of containers;
  - iii. the size(s) of containers.
  - iv. the condition of each container(s);
  - v. the contents (including but not limited to empty barrel residues) of each

container including

- (a) the name of each material;
- (b) the chemical composition of each material;
- (c) the physical state of each material (e.g., solid, sludge liquid);
- (d) the volume of each material; and

vi. please include all available documentation.

c. Did your association with New England Container involve the selling of drums or other size/type of container? Unless your answer is an absolute "No", please explain. Include but do not limit your response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s);
- iv. the condition of each container(s);
- v. the contents (including but not limited to empty barrel residues) of each container including
  - (a) the name of each material;
  - (b) the chemical composition of each material;
  - (c) the physical state of each material (e.g., solid, sludge, liquid);
  - (d) the volume of each material; and
- vi. please include all available documentation.

d. Did your association with New England Container involve the reconditioning of drums or other size/type of container? Unless your answer is an absolute "No", please explain.

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s);
- iv. the condition of each container(s);
- v. the contents (including but not limited to empty barrel residues) of each container including
  - (a) the name of each material;
  - (b) the chemical composition of each material;
  - (c) the physical state of each material (e.g., solid, sludge, liquid);
  - (d) the volume of each material; and
- vi. please include all available documentation.

e. Did New England Container ever perform any other service for you or your company? Unless your answer is an absolute "No", please explain. Include but do not limit your response to:

- i. the type of service(s);
- ii. the frequency of the service(s);
- iii. the date(s) of service(s); and

iv. please include any available documentation.

f. Did Respondent ever pick up materials from other parties which were taken directly or indirectly to New England Container (to be referred to as "customers" for purposes of this Information Request)? Unless your answer is an absolute "No", please explain.

i. identify (see Definitions) all persons and entities from whom Respondent picked up materials which were taken directly or indirectly to New England Container.

g. In addition to providing a list that identifies all such customers, provide for each pickup and delivery of materials to New England Container:

- i. the dates of each pickup and delivery;
- ii. the type of container(s);
- iii. the size of the container(s);
- iv. the condition of each container(s);
- v. the contents (also empty barrel residues) of each container including
  - (a) the name of each material;
  - (b) the chemical composition of each material;
  - (c) the physical state of each material (e.g., solid, sludge, liquid);
  - (d) the volume of each material; and
- vi. please include all available documentation.

7. Information About Others

a. If you have information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site which is not included in the information you have already provided, provide all such information.

b. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

8. Compliance with This Request

a. Describe all sources reviewed or consulted in responding to this request, including but

not limited to:

- i. the names of all individuals consulted;
- ii. the current job title and job description of each individual consulted;
- iii. the job title and job description during the period being investigated of each individual consulted;
- iv. whether each individual consulted is a current or past employee of Respondent;
- v. the names of all divisions or offices of Respondent for which records were reviewed;
- vi. the nature of all documents reviewed; and
- vii. the locations where those documents reviewed were kept prior to review; and
- viii. the location where those documents reviewed are currently kept.

The following form of declaration must accompany all information submitted by Respondent in response to the Information Request:

### DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

\_\_\_\_\_ and that the foregoing is complete, true, and correct.

Respondent

Executed on \_\_\_\_\_, 20\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Type Name

\_\_\_\_\_  
Title [if any]

## INFORMATION REQUEST INSTRUCTIONS

1. Answer Every Question Completely. You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.
2. Number Each Answer. Number each answer with the number of the question to which it corresponds.
3. Provide Information about the Period Being Investigated. You are required to answer each question with respect to the period being investigated, unless the question specifically states otherwise. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.
4. Provide the Best Information Available. You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
6. Submit Documents with Labels Keyed to Question. For each document produced in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.
7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within 30 days of discovering such responsive information may subject you to \$27,500 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the company may be subject to criminal prosecution.
8. Complete the Enclosed Declaration. You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.

9. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). ~~All information claimed to be confidential should be contained on separate sheet(s) and should~~ be clearly identified as "trade secret" or "proprietary" or "company confidential." Personal financial information, including individual tax returns, may also be claimed as confidential. In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.** You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

10. Disclosure to EPA Contractor. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors listed in the attached EPA Contractor List for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

11. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you. (Please see Instruction 9 for information concerning treatment of individual tax returns.)

12. Objections to Questions. While the Respondent may indicate that it objects to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.

13. Claims of Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any document for which you assert that a privilege exists for a portion of it, provide the portion of the



document for which you are not asserting a privilege, identify the portion of the document for which you are asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

## EPA CONTRACTOR LIST

### CONTRACTOR

### CONTRACT NUMBER

Techlaw, Inc.

~~ZES Contract #68-W-019~~

Subcontractors:

Blake Investigative Services

Northbridge Environmental Management Consultants

Watts Engineering

Podziba & Associates

Effective: 1/28/99

Arctic Slope Regional Corp.(ASRC) Aerospace

Contract #68-W-01-002

Effective: 11/16/00

Booz, Allen & Hamilton

Contract #GS09K99BHD0002

Effective: 10/05/00

## INFORMATION REQUEST DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq. or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, successors, assigns, and agents, and any predecessor or successor corporations or companies.
2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include but not be limited to:
  - (a) writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
    1. invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order;
    2. letter, correspondence, fax, telegram, telex, Email;
    3. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
    4. agreement, contract, and the like;
    5. log book, diary, calendar, desk pad, journal;
    6. bulletin, circular, form, pamphlet, statement;
    7. report, notice, analysis, notebook;
    8. graph or chart; or
    9. copy of any document.
  - (b) microfilm or other film record, photograph, or sound recording on any type of device;
  - (c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:
    1. the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and
    2. printouts of such punch card, disc, or disc pack, tape or other type of memory; and

- (d) attachments to or enclosures with any document as well as any document referred to in any other document.

3. The term "identify" or "provide the identity of" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; ~~(c) present or last known employer (include full name and address) with job title, position or business;~~ and (d) the person's social security number.

4. The term "identify" or "provide the identity of" means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g. corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.

5. The term "identify" or "provide the identity of" means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressor, addressee and/or recipient; (e) and a summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.

6. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.

7. The terms "the period being investigated" and "the relevant time period" shall mean the period being investigated as specified on the first page of the Information Request Questions.

8. The terms "the Site" or "the facility" shall mean and include the property on or about the Centredale Manor Restoration Project Superfund Site, which is more fully described in the enclosed Site Description.

9. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

10. The term "asset" shall mean and include but not be limited to the following: cash, commodities, personal property, collectibles, real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations, and unincorporated companies, whether foreign or domestic, securities, patents, stocks, bonds, and other tangible as well as intangible property.

11. The term "real estate" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

## SITE DESCRIPTION

The main area of the Centredale Manor Superfund Site, consisting of approximately 9.04 acres, is located in North Providence, Rhode Island, just south of Route 44 on the eastern bank of the Woonasquatucket River. The main area is known as 2072 and 2074 Smith Street (or, plat 14, lots 200 and 250). The entire Site extends on the floodplain of the Woonasquatucket River from the main portion of the Site south to the Lymansville Dam. The Site consists of all contaminated areas within this area as well as any other location to which contamination from that area has come to be located, or from which that contamination came.

Currently, two high rise buildings (Centredale Manor and Brook Village, both low-income senior citizen complexes) are located in the main area of the Site. In addition to the buildings, the main area is covered by roadway and parking lots. On the eastern portion of the main area is a drainage swale that begins near the northern portion of the main area and extends south, then curves to the west and discharges into a wooded wetland south of the main area and eventually into the Woonasquatucket River and Allendale Pond.

EPA has reason to believe that prior to 1936, the Site properties were occupied by Centredale Worsted Mills, a woolens manufacturing plant. Atlantic Chemical Company, a chemical manufacturer, began operating on a portion of the Site in approximately 1940. Atlantic Chemical Company changed its name in 1953 to Metro-Atlantic, Inc. and operated at the Site until the late 1960s or early 1970s. In the late 1960s or early 1970s, Metro-Atlantic, Inc., changed its name to Crown-Metro, Inc. The chemical operations ceased in the early 1970s. New England Container Company operated a drum reconditioning facility on a portion of the Site from approximately 1952 until 1969. A major fire in the early 1970s destroyed most of the structures at the Site. Evidence suggests that the operations of the chemical companies and the drum reconditioning facility at the Site resulted in releases and threats of releases of hazardous substances at the Site. Construction activities related to the apartment complexes that occurred after 1970 may have caused additional releases of hazardous substances.

Analyses of soils, wetlands and flood plain samples at the Site indicates elevated levels of hazardous substances, pollutants or contaminants, including but not limited to, 2,3,7,8 - Tetrachlorodibenzo-*p*-Dioxin ("dioxin"), polychlorinated biphenyls ("PCBs" or "aroclor"), polycyclic aromatic hydrocarbons ("PAHs", including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, and indeno(1,2,3-cd)pyrene), and metals (including antimony, arsenic, chromium, lead, and manganese).

EPA has conducted time critical removal, non-time critical removal, and remedial activities at the Site. Currently, EPA is conducting Remedial Investigation activities at the Site, and anticipates the initiation of certain non-time critical removal activities at the Site in the summer of 2001.

**END OF THE INFORMATION REQUEST**

**THANK YOU FOR YOUR ASSISTANCE IN THIS MATTER**

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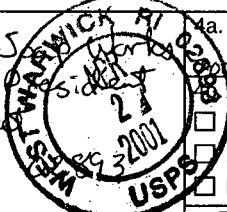
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4a. Article Number

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S. MacKewicz

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PS Form 3811, December 1994

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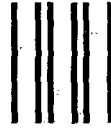
West Warwick, RI 02893

PS Form 3800, May 2000

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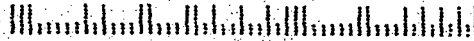
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PS Form 3800, May 2000 (Reverse)

102595-99-M-2087